

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

TOYE TUTIS, et. al

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Hon. Jerome B. Simandle, C.U.S.D.J.

Crim. No. 14-699 (JBS)

NOTICE OF MOTION FOR A 90 DAY EXTENSION
OF THE GOVERNMENT'S DISCOVERY DEADLINE

TO: ALL COUNSEL (see attached list)

PLEASE TAKE NOTICE that at the previously scheduled July 15, 2015 status conference, or as soon as counsel may be heard, the United States, by and through its attorney, Paul J. Fishman, United States Attorney for the District of New Jersey, Diana Vondra Carrig, Assistant U.S. Attorney appearing, will move before the Honorable Jerome B. Simandle, Chief United States District Judge, for a 90 day extension of time for the July 9, 2015 discovery deadline.

The Government requests this extension of time due to the extraordinary volume of discovery materials and the time involved in accumulating, assimilating, reviewing and disclosing such materials. Counsel for the Government has raised this issue with all defense counsel via email and various counsel via telephone and in person meetings, and to date all of the defense attorneys have stated that they do not object to the Government's request for additional time, including: Dennis Cogan, Esquire for defendant Toye Tutis; Edwin J. Jacobs, Jr., Esquire for defendant Kareem Taylor; Rocco C. Cipparone, Jr., Esquire for defendant Phillip Horton; Gilbert J. Scutti, Esquire for defendant Tozine Tiller; Frederick W. Klepp, Esquire for defendant Talib Tiller; David S. Rudenstein, Esquire for defendant Kabaka Atiba; John F. Renner, Esquire for John

Wellman; Richard Sparaco, Esquire for defendant Ronald Douglas Byrd; and Troy A. Archie, Esquire for defendant Jazmin Vega. In addition, the Government represents to the Court that several of the defense attorneys have stated that they have not had sufficient time to review the very voluminous discovery materials provided to date.

The Government will supplement its request at the status conference on July 15, 2015 or at an earlier time at the direction of the Court.

Respectfully submitted,

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